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Attorney for Defendant  
JOSHUA DAVID PRICE

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:24-cr-121-WBS
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER TO
v.	)	CONTINUE STATUS CONFERENCE AND
	)	EXCLUDE TIME
JOSHUA DAVID PRICE,	)	
	)	New Date: July 14, 2025
Defendant.	)	Time: 10:00 a.m.
	)	Judge: Hon. William B. Shubb
	)	

IT IS HEREBY STIPULATED by and between the parties through their respective counsel, ROGER YANG, Assistant United States Attorney, attorney for Plaintiff, and RACHELLE BARBOUR, attorney for Defendant, JOSHUA DAVID PRICE, that the Status Conference set for Tuesday, May 27, 2025, at 10:00 a.m., be continued to **Monday, July 14, 2025, at 10:00 a.m.** and that time be excluded for the reasons set forth below.

Defense Counsel has received significant discovery that is subject to a protective order and must be reviewed personally with Mr. Price and cannot be left with him at the jail. This additional discovery includes native files that must be played for Mr. Price at the jail. Investigation is ongoing. Defense Counsel has been reviewing and analyzing the discovery, conducting legal research, meeting with her client, and otherwise preparing for trial. The

1 Government has produced additional discovery relevant to an anticipated plea offer and native  
2 files must be reviewed by defense counsel at the office of law enforcement. The above tasks are  
3 ongoing, and the defense requires additional time to review discovery, discuss the case with her  
4 client and the Government, and continue to prepare.

5 The parties believe that failure to grant the requested continuance would deny defense  
6 counsel the reasonable time necessary for effective preparation, taking into account the exercise  
7 of due diligence. Accordingly, the parties stipulate and request that the Court exclude time  
8 between the date of the filing of this stipulation through the new status conference date of July  
9 14, 2025 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the  
10 ends of justice served by continuing the case as requested outweigh the interest of the public and  
11 the defendant in a trial within the original date prescribed by the Speedy Trial Act.

12 Dated: May 21, 2025

Respectfully submitted

13 HEATHER E. WILLIAMS  
14 Federal Public Defender

15 /s/ Rachelle Barbour  
16 RACHELLE BARBOUR  
17 Assistant Federal Defender  
Attorneys for Defendant  
JOSHUA DAVID PRICE

18 Dated: May 21, 2025


MICHELE BECKWITH  
Acting United States Attorney

20 /s/ Roger Yang  
21 ROGER YANG  
22 Assistant United States Attorney  
Attorney for Plaintiff

23 **ORDER**

24 The Court hereby adopts the new Status Conference date and excludes time for the  
25 reasons set forth above under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

26 Dated: May 21, 2025

27   
28 WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE